

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

No. 18-CR-03989 WJ

vs.

ALLISTER QUINTANA,

Defendant.

DEFENDANT'S EIGHTH MOTION TO EXTEND DEADLINES

Defendant Allister Quintana, through his attorney, Ray Twohig, moves that deadlines for counsel to file sentencing memoranda be extended and that the sentencing hearing be vacated and rescheduled. The grounds are as follows.

1. Several sentencing dates have been set, then modified for various reasons. The current sentencing date is September 2, 2021.
2. At the time of the court's orders rescheduling this matter, the Court set deadlines for counsel's submissions. Those deadlines have not been able to be met for various reasons. Earlier, it was because the report of Dr. Christine Johnson, Ph.D had been delayed. Then, after it was completed, communications with Mr. Quintana and counsel became logistically complicated further, by both the pandemic and technical difficulties with Zoom calls. Then, recommendations from Dr. Johnson to seek additional expertise caused counsel to make multiple inquiries, with the latest yielding an ex parte motion to authorize additional expert funding. That request has been filed.

3. The Sixth Motion for Extension (Doc 80) advised that “meetings between client and counsel and Ms. Gordon have been frequent, and have continued since the earlier motions, as pointed out in the Seventh Motion for Extension (Doc 82).
4. The Seventh Motion for Extension disclosed that counsel would be seeking “additional research, investigation and expert assistance.” As that motion noted, Defendant’s attorney has provided certain documents to the Government to facilitate further discussions, and to minimize future inconvenience and enable a more streamlined sentencing proceeding. Since that time, the approach to additional expert assistance has been refined through consultation with various professionals, including academics. This has caused the current pending authorization request. Defendant seeks an extension to November 1, 2021 to complete his sentencing memorandum because of the logistical issues involved in implementing the expert request, and the possible additional delays which may result from that process.
5. Extension of the deadlines is requested as well as rescheduling the sentencing in this matter.

Assistant United States Attorney Joseph Spindle opposes this motion.

Respectfully submitted,

/s/ Ray Twohig

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I hereby certify that on the 6th day of August, 2021, I filed the foregoing electronically through the CM/ECF system, which caused all parties and counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Ray Twohig

Ray Twohig